

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

MARTEN GROUP, INC. d/b/a
SENERGY MEDICAL GROUP and
SCOTT TENNANT,

Plaintiffs,

v.

JERALD TENNANT, MD, JOHN
TENNANT, TERESA JESSEN
TENNANT, JARED TENNANT,
TENNANT DEVICES AND
ACCESSORIES, LLC, and
CURADOR,
LLC,

Defendants.

Case No. 3:24-cv-01852

JURY TRIAL DEMANDED

MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANTS

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

NOW COME Tyler L. Farmer and Ariel A. Martinez of Martinez & Farmer LLP and Alison Battiste Clement and Gabriela Isuani Monahan of Battiste Clement PLLC (“Counsel”), who respectfully move this Court to withdraw as counsel on behalf of Defendants Jerald Tennant, M.D., John Tennant, Teresa Jessen Tennant, Jared Tennant, Tennant Devices and Accessories, LLC, and Curador, LLC (together, “Defendants”). In support of this Motion to Withdraw, counsel states:

1. Martinez & Farmer LLP was retained for Defendants on or about August 9, 2024 and entered an appearance in this case on August 16, 2024.

2. Battiste Clement PLLC was retained as local counsel for Defendants on or about April 14, 2025 and entered an appearance in this case on April 14, 2025.

3. A conflict of interest has arisen that prevents continued representation consistent with the Texas Disciplinary Rules of Professional Conduct. Good cause exists for withdrawal due to the unavoidable conflict of interest.

4. This motion is made in good faith and not for the purpose of delay.

5. The withdrawal will not prejudice Defendants or unduly delay the proceedings. Trial is set for almost a year away, on August 4, 2026.

6. Sufficient time remains before any scheduled proceedings for Defendants to obtain new counsel.

7. Defendants have been notified of this motion by telephone and email on August 14, 2025 and were provided a copy of this motion on August 26, 2025 with a request for signature. Counsel did not receive signatures in response. Counsel understands that Defendants are in the process of obtaining successor counsel.

8. Opposing counsel has been notified of this motion.

9. All Defendants' files, documents, and property will be returned to Defendants or transferred to successor counsel upon entry of an order granting this

motion.

10. Counsel will continue to protect all Defendants' confidences and attorney-client privileged communications.

11. The Defendants' current addresses and telephone numbers are as follows:

Tennant Devices and Accessories, LLC

9901 Valley Ranch Parkway E #2000
Irving, TX 75063
(817) 874-7550

Curador, LLC

312 Steeplechase Drive
Irving, TX 75062
(916) 804-6372

Dr. Jerald Tennant

9901 Valley Ranch Parkway E #2000
Irving, TX 75063
(817) 874-7550

John Tennant

312 Steeplechase Drive
Irving, TX 75062
(916) 804-6372

Jared Tennant

9901 Valley Ranch Parkway E #2000
Irving, TX 75063
(214) 336-1304

Teresa Jessen Tennant

312 Steeplechase Drive
Irving, TX 75062
(916) 804-6372

12. There are no pending deadlines or scheduled proceedings that would be prejudiced by withdrawal.

WHEREFORE, PRESUMES CONSIDERED, for the foregoing reasons, Tyler L. Farmer and Ariel A. Martinez of Martinez & Farmer LLP and Alison Battiste Clement and Gabriela Isuani Monahan of Battiste Clement PLLC respectfully request that this Court grant this Motion to Withdraw as Counsel; Order that all future pleadings, notices, and communications be served directly upon Defendants at their addresses listed above; and the Court grant such other and further relief as the Court deems just and proper.

Dated: September 2, 2025

Respectfully submitted,

MARTINEZ & FARMER LLP

/s/Tyler L. Farmer

/s/Ariel A. Martinez

Tyler L. Farmer, WSBA No. 39912

Pro Hac Vice

Ariel A. Martinez, WSBA No. 54869

Pro Hac Vice

4020 East Madison St., Suite 300

Seattle, WA 98112

Tel: (206) 208-2270

E: tyler@mfseattle.com

E: ariel@mfseattle.com

BATTISTE CLEMENT PLLC

/s/ Alison Battiste Clement

/s/ Gabriela Isuani Monahan

Alison Battiste Clement

Texas Bar No. 24062603

Gabriela Isuani Monahan

Illinois Bar No. 6212056

2626 Cole Avenue, Suite 300

Dallas, TX 75204

Tel: (214) 540-7206

Fax: (972) 629-9818

E: alison@battisteclement.com

E: gabriela@battisteclement.com

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(i), the undersigned certifies that the parties have complied with the meet and confer requirements of Local Rule CV-7(h) and have notified opposing counsel of this motion by attempting to confer on Friday, August 29 and by conferring by telephone on September 2, 2025 at which time opposing counsel said that he would attempt to get his client's position by close of business but was not sure that he would be able to do so.

By: /s/Tyler L. Farmer
Tyler L. Farmer

CERTIFICATE OF WORD COUNT

Pursuant to Section II.A. of the Court's Procedures for Cases Assigned to District Judge Ada Brown and Standing Order, the undersigned hereby certifies that, per the word-processor register, the foregoing Motion contains 472 words, excluding the case caption, signature block, and certificates.

By: /s/Tyler L. Farmer
Tyler L. Farmer

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon all counsel of record through CM/ECF on September 2, 2025.

By: /s/Tyler L. Farmer
Tyler L. Farmer